

LAW OFFICES  
SIDEMAN & BANCROFT LLP  
ONE EMBARCADERO CENTER, 22<sup>ND</sup> FLOOR  
SAN FRANCISCO, CALIFORNIA 94111-3711

1 RICHARD J. NELSON (State Bar No. 141658)  
E-Mail: *rnelson@sideman.com*  
2 PETER M. COLOSI (State Bar No. 252951)  
E-Mail: *pcolosi@sideman.com*  
3 ANNA P. CHANG (State Bar No. 301468)  
E-Mail: *achang@sideman.com*  
4 SIDEMAN & BANCROFT LLP  
5 One Embarcadero Center, Twenty-Second Floor  
San Francisco, California 94111-3711  
6 Telephone: (415) 392-1960  
7 Facsimile: (415) 392-0827

8 Attorneys for Plaintiffs CISCO SYSTEMS, INC.  
and CISCO TECHNOLOGY, INC.

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 CISCO SYSTEMS, INC., a California  
14 corporation, and CISCO TECHNOLOGY,  
15 INC., a California corporation,

16 Plaintiffs,

17 v.

18 DMITRI SHAITOR, an individual, and OD  
19 NETWORKS, a Maryland limited liability  
company, and DOES 1-50,

20 Defendants.  
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Case No. 3:18-cv-00480 LB

**STIPULATION AND ~~[PROPOSED]~~**  
**ORDER FOR ENTRY OF PERMANENT**  
**INJUNCTION**

Hon. Laurel Beeler

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 SAN FRANCISCO, CALIFORNIA 94111-3711

Plaintiffs Cisco Systems, Inc. and Cisco Technology, Inc. and Defendants Dmitri Shaitor and OD Networks, in conjunction with their settlement of this Action and without admission of liability, hereby stipulate to, and request the Court, enter permanent injunctive relief as set forth below.

DATED: December 13, 2019

Respectfully submitted,

SIDEMAN & BANCROFT LLP

By: /s/ Peter M. Colosi

Peter M. Colosi

Attorneys for Plaintiffs CISCO SYSTEMS, INC.  
 and CISCO TECHNOLOGY, INC.

DATED: December 13, 2019

BERLINER COHEN LLP

By: /s/ Frank R. Ubhaus

Frank R. Ubhaus

Attorneys for Defendants

DMITRI SHAITOR and OD NETWORKS

### **ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from the signatory above.

DATED: December 13, 2019

SIDEMAN & BANCROFT LLP

By: /s/ Peter M. Colosi

Peter M. Colosi

**~~[PROPOSED]~~ ORDER**

The above-captioned matter, having come before the Court upon the parties' joint stipulation requesting an order granting a permanent injunction, and the Court having considered the same,

NOW, THEREFORE, it is on this 16th day of December, 2019, ORDERED that Defendants Dmitri Shaitor and OD Networks LLC, and Defendants' agents, servants, employees, affiliates, and other individuals and entities affiliated with, owned or controlled by, or in active concert or participation with Defendants, including but not limited to Network Supplies & More LLC, Olesia Bankova, and Max Bankov, are forever restrained from:

a. manufacturing, importing, advertising, promoting, marketing, offering to sell, selling, distributing, or transferring any product (either genuine or counterfeit) bearing a Cisco-owned trademark (a "Cisco-Branded Product");

b. using any other false designation of origin, false description or representation, or any other use of Cisco's name or marks, logo or trade dress, or counterfeit versions thereof, in any manner, including but not limited to any manner calculated to falsely advertise counterfeit products as being manufactured, distributed, sponsored, authorized, or endorsed by Cisco, or otherwise associated with Cisco in any way; and

c. secreting, concealing, destroying, selling off, transferring, returning, or otherwise moving, storing, or disposing of any Cisco-Branded Product, other than by sending such counterfeit product to Cisco.

**IT IS SO ORDERED.**

Dated: December 16, 2019

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 Honorable Laurel Beeler  
 United States District Court Magistrate Judge